

# EXHIBIT F

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
KANSAS CITY DIVISION**

**IAN POLLARD on behalf of himself  
and all others similarly situated**

**Plaintiffs**

**VERSUS**

**REMINGTON ARMS COMPANY, LLC.,  
SPORTING GOODS PROPERTIES, INC.  
and E.I. DU PONT NEMOURS AND  
COMPANY**

**Defendants**

**Case No. 4:13-cv-00086-ODS**

**AFFIDAVIT/DECLARATION OF LEWIS M. FROST**

**STATE OF LOUISIANA  
PARISH OF JEFFERSON**

BEFORE ME, Notary Public, duly commissioned in the Parish and State aforesaid  
came and appeared:

**LEWIS M. FROST**

Who after been duly sworn did depose and say:

1. I am giving this Affidavit/Declaration of my own personal knowledge;
2. I am a person over the full age of majority and domiciled in the Parish of  
Jefferson, State of Louisiana;
3. I am employed as a Jefferson Parish Sheriff's Deputy, am a P.O.S.T. certified  
firearm instructor, NRA Precision Rifle Instructor, Department of State

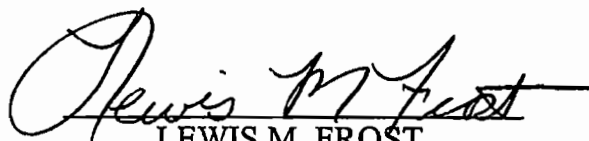
Approved Designated Defensive Marksman Instructor, and am also an owner of Phobos Solutions, LLC, a company that specializes in Firearms Training, Louisiana Concealed Weapon Courses, Unarmed Self Defense Classes, Personal Security Services, Business and Security Solutions, and Mobile Training for Law Enforcement;

4. I have personally instructed numerous state, parish, and federal law enforcement officers, as well as thousands of civilians, in advanced firearms training and have personally observed the unintended discharge of Remington rifles that are the subject of this proposed Settlement while instructing fellow officers;
5. I have become aware through my interest in this proposed Settlement that Remington has represented to the Court that members of Settlement Class A(3) (All current owners of Remington Model 600, 660, and XP-100 firearms containing a Remington trigger mechanism that utilizes a trigger connector, predominantly produced between 1962 and 1982) possess rifles that cannot be “readily” retrofitted with a Remington connectorless trigger and are being offered a \$12.50 voucher to purchase Remington products in lieu of repair of these dangerous firearms;
6. As recent as January 27, 2017, (See Exhibit A) Remington still posts on its website, [www.remington.com](http://www.remington.com) the ongoing recall (Safety Modification Program) of Model 600 & 660 Rifles wherein Remington states that if “your rifle’s trigger assembly is found to be in an unsatisfactory or potentially unsafe

operating condition because of any number of factors, including wear, alteration or maintenance, the **entire trigger assembly will be replaced** with a new factory trigger assembly, which does not incorporate a block-lock mechanism. On the same webpage, Remington discusses the 1979 recall of the Model 600 & 660 rifles wherein “owners of the affected rifles could return their guns **for installation of a new trigger assembly** at no charge.” According to Remington, these dangerous rifles **can be repaired.**;

7. I am also personally aware that in addition to Remington’s own website stating that the trigger assembly can be replaced, Remington Model 600 & 660 and XP-100 firearms can be retrofitted with replacement triggers to remove the Remington trigger causing unintended discharges. As of December 27, 2016, Timney Triggers still advertises (on its website as well as through Brownells and Midway USA) a replacement trigger to “readily” retrofit the Model 600 & 660. See, Exhibit B. Shilen Rifles, Inc. also advertises a replacement trigger to “readily” retrofit the XP-100 rear grip silhouette pistol. See, Exhibit C.
8. I have become aware through my interest in this proposed Settlement that Remington suggests members of Settlement Class A(4) (All current owners of Remington Model 721, 722, and 725 firearms containing a Remington trigger mechanism that utilizes a trigger connector,” produced between 1948 and 1961) possess rifles that cannot be “readily” retrofitted with a Remington connectorless trigger and are offered a \$10.00 voucher to purchase Remington products in lieu of repair of these dangerous firearms.

9. As recent as January 27, 2017, (See Exhibit D) Remington still posts on its website, [www.remington.com](http://www.remington.com) the ongoing recall (Safety Modification Program) of Model 721 & 722 Rifles wherein Remington states that if “your rifle’s trigger assembly is found to be in an unsatisfactory or potentially unsafe operating condition because of any number of factors, including wear, alteration or maintenance, **the entire trigger assembly will be replaced** with a new factory trigger assembly, which does not incorporate a block-lock mechanism.
10. I am also personally aware that in addition to Remington’s own website stating that the trigger assembly can be replaced, Remington Model 721 & 722 Rifles can be retrofitted with replacement triggers to remove the Remington trigger causing unintended discharges. As of December 27, 2016, Rifle Basix and Numrich Corporation advertise a replacement trigger to “readily” retrofit Model 721 & 722 Rifles. See, Exhibit E
11. For the reasons outlined in the Objection to Class Action Settlement and Reply to Joint Response to Objections of Lewis M. Frost and Richard L. Denney and the grounds set forth herein, this settlement, as currently written, should not be approved.

  
LEWIS M. FROST

SWORN TO AND SUBSRIBED,  
BEFORE ME, THIS 30 DAY  
OF JANUARY, 2017

  
NOTARY PUBLIC

STEVEN M. MAUTERER  
Notary Public #60925, La. Bar #26682  
210 Huey P. Long Ave., Gretna, LA  
Parish of Jefferson, State of Louisiana  
My Commission is issued for life.

(1)

SHOP

~~(/RETAIL/SHOP/)~~  
LOCATOR)

# REMINGTON MODEL 600 & 660

If you own a Remington Model 600 (including the Mohawk 600) or Model 660 rifle:

All Remington Model 600 and Model 660 rifles were manufactured with a bolt-lock mechanism and are subject to this bolt-lock Safety Modification Program. These models were discontinued in 1979. Please see Important Safety Notice regarding the 1979 recall below. If you participate in the current Safety Modification Program, your firearm will be cleaned and inspected for proper functioning by a qualified gunsmith. Once the condition of your firearm has been assessed, you will be notified of one of the following:

- Your rifle's trigger assembly is otherwise in good operating condition and the gunsmith will proceed to physically remove the bolt-lock feature so that your firearm can be loaded and unloaded while the safety remains in the "S" or "On Safe" position; or
- Your rifle's trigger assembly is found to be in an unsatisfactory or potentially unsafe operating condition because of any number of factors, including wear, alteration or maintenance. The entire trigger assembly will be replaced with a new factory trigger assembly, which does not incorporate a bolt-lock mechanism.

The cost, if any, to you for participating in the bolt-lock Safety Modification Program will depend upon whether your Model 600 or 660 rifle was previously repaired under a 1979 recall program.

## IMPORTANT SAFETY NOTICE:

In 1979, Remington instituted a recall for Model 600 and 660 rifles made before February, 1975, because, under certain circumstances, the safety and trigger could be manipulated in a way that could result in an accidental discharge. Under the 1979 recall program, owners of the affected rifles could return their guns for installation of a new trigger assembly at no charge. Since 1979, thousands of the affected firearms have been serviced under the 1979 recall and received new trigger assemblies.

How can you tell if your Model 600 or 660 rifle was subject to the 1979 recall, and whether it was repaired as part of that program?

- Model 600 and 660 rifles - except those with a serial number beginning with an "A" before the serial number - were subject to the 1979 recall.
- Each Model 600 and 660 rifles repaired under the 1979 recall has a "V" (approximately 1/4 inch high) stamped on the left side of the trigger below the receiver line. These replacement trigger assemblies included the bolt-lock feature.

If you own a Model 600 or 660 rifle that was subject to the 1979 recall, does the current bolt-lock Safety Modification Program affect you?

- If your Model 600 or 660 rifle was subject to the 1979 recall but was never repaired as part of that recall, then a new trigger assembly without a bolt-lock feature will be installed. This change will be made at no cost to you.
- If your Model 600 or 660 rifle was repaired as part of the 1979 recall, or it was not subject to the 1979 recall, you may have the bolt-lock removed at a cost of \$20, plus shipping and handling, plus tax. You will also receive a safety redemption certificate to complete and submit in order to receive a free blaze orange hat (one hat per certificate).

How to participate in the Safety Modification Program :

Complete the General Repair Form and send or deliver your firearm and the completed repair form to either:

Remington Arms Company, Inc.

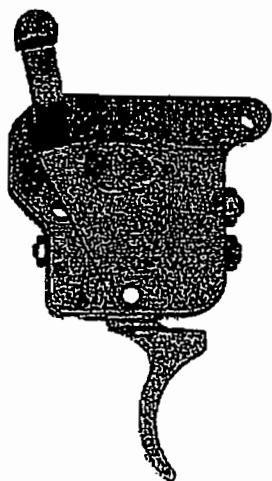
Ilion Firearms Plant







## REMINGTON



### REMINGTON 600

OUR PRICE: \$150.75

Item #: 500

Pull Weight

3 Pounds

Model

Rem 600 #500

### DESCRIPTION

Using the same innovative design as our Remington 700 with safety trigger, this is manufactured to drop right into your Remington 600 rifle. When in the safe position the trigger is locked in place, preventing movement. The safety is two position, allowing the bolt to be opened (and the rifle to be unloaded) in the safe position.

### INSTRUCTIONS

Download PDF

### COMPATIBILITY

Rem 600 #500 works with these rifles:

Model 600

Model 660

**WORLD'S FINEST TRIGGERS**  
PROUDLY MADE IN THE USA SINCE 1946



1-800-741-0015

Home Rifle Parts Triggers Parts Triggers REMINGTON 600 TRIGGER W/ SAFETY



## TIMNEY - REMINGTON 600 TRIGGER W/ SAFETY



883-000-013WB  
Rem. 600 Trigger  
w/Safety, Blue  
Mfr Part: 500

\$149.99

Style: Adjustable

Out of Stock

5.0

Open Expanded View\*

### Provides A Light, Clean Break To Help You Get The Best Possible Accuracy

Adjustable, Featherweight-style, single-stage trigger for delivers clean, crisp trigger pulls that help improve accuracy. Adjustable for weight of pull (1½-4lb.), creep and overtravel. Lock nuts hold settings. Fits right-hand Remington 600 rifles and comes with safety.

Big Book Catalog, Issue:69, Page:163  
Sinclair, Issue:5B, Page:257

**SPECS:** Aluminum housing. Heat-treated steel internals. Polished sear/trigger surfaces. Serrated .250" (6.3mm) wide shoe. Includes instructions.



883-000-082WB  
Remington 600  
Tactical Trigger, 4  
Oz  
Mfr Part: 500T

\$149.99

Style: Adjustable, Drop-In

In Stock

0.0

### ALSO BOUGHT



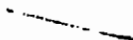
REMINGTON 600  
TRIGGERGUARD &  
FLOORPLATE  
HERITAGE ARMS  
\$160.99 - \$177.99



1911 GOVERNMENT  
RECOIL SPRINGS  
ISMI  
\$7.99



MICULEK REVOLVER  
SPRING KIT  
BANG  
\$17.99



CONTOUR #3 BARREL  
SHILEN  
\$191.99 - \$284.99

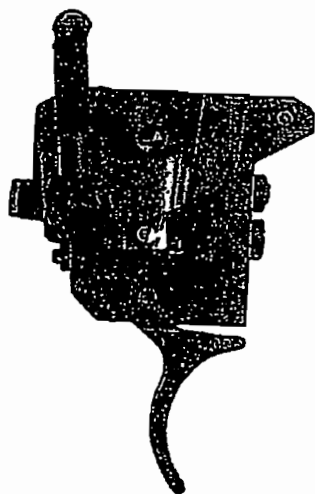




MidwayUSA.com  
1-800-243-3220  
5875 West Van Horn Tavern Rd.  
Columbia, MO 65203


## Timney Rifle Trigger Remington 600 with Safety 1-1/2 to 4 lb Blue

Product #: 140753 Timney #: 500 UPC #: 081950005000



**\$149.99**

Out of Stock, Backorder OK

 Date expected in stock: Overdue

Quantity:



Aluminum alloy housing with machined and hardened steel work surfaces. Trigger is adjustable from 1-1/2 to 4 lbs and offers a serrated 3/8" wide trigger for better control. Adjustable for creep, overtravel and backlash. Bolt can be operated with safety "ON". For use in right hand actions only.

**TIMNEY**  
mfg, inc.

### Technical Information

Fit: Compatible with Model 600 & 660

NOTE: Prices, specifications and availability are subject to change without notice. We reserve the right to correct typographic, photographic and/or descriptive errors.

PRODUCTS:  
TRIGGERS  
.....HOMEEXPORT

Products::Triggers

PRODUCTSPRICESFAQCONTACT

Hunters and competition shooters have precisely the same needs when it comes to triggers. Both need an extremely reliable trigger that releases crisply, without "creep" and inconsistency in pull pressure. Both require predictable, positive adjustments for attaining trigger performance tailored to a specific use. All this is built into every Shilen trigger. These gems of materials and machining are steel bodied. All moving parts are heat-treated and sear surfaces are ground and polished.

**Shilen Standard Trigger**

Available in stainless and chrome-moly

This specialized hunting trigger is three-way adjustable for weight of pull, sear engagement, and overtravel. Pull weight is adjustable from 1 1/2 to 3 pounds. This trigger does not come with a safety. You must use the safety from your original Rem 700 trigger. If you have the newer X-Mark Pro, you must purchase a safety kit and bolt action release.

**Caution:** Although it is possible to adjust this trigger to less than 1 1/2 pounds, the practice is NOT recommended because it can result in unintentional firing.

**Shilen Competition Trigger**

Featuring a crisp release ranging from 2 to 6 ounces, this match trigger is easily set for pull weight, sear engagement, and overtravel. It cannot be adjusted heavier than 6 ounces.

Both triggers fit Remington Model 700 style actions including the Remington 40X, rear-grip XP-100 silhouette pistols and several custom actions featuring the hanger-style trigger mount.



[\(1\)](#)[SHOP](#)[\(/RETAIL/SHOP/LOCATOR\)](#)

## REMINGTON MODEL 721 & 722

If you own a Remington Model 721 or 722 rifle:

All Remington Model 721 and 722 rifles were manufactured with a bolt-lock mechanism. These models were discontinued in 1961. If you participate in the Safety Modification Program, your firearm will be cleaned and inspected for proper functioning, by a qualified gunsmith. Once the condition of your firearm has been assessed, you will be notified of one of the following:

- Your rifle's trigger assembly is otherwise in good operating condition and the gunsmith will proceed to physically remove the bolt-lock feature so that your rifle can be loaded and unloaded while the safety remains in the "S" or "On Safe" position; or
- Your rifle's trigger assembly is found to be in an unsatisfactory or potentially unsafe operating condition because of any number of factors, including wear, alteration or maintenance. The entire trigger assembly will be replaced with a new factory trigger assembly, which does not incorporate a bolt-lock mechanism.

In either case, the total cost to you is \$20 plus shipping and handling. You will also receive a safety redemption certificate to complete and submit in order to receive a free blaze orange hat (one hat per certificate).

How to participate in the Safety Modification Program

Complete the General Repair Form and send or deliver your firearm and the completed repair form to:

Remington Arms Company, Inc.

Ilion Firearms Plant

Attention: BL Safety Program

14 Hoefer Avenue

Ilion, NY 13357

Remington will bill or arrange for payment once your firearm is received and evaluated.

**CAUTION:** It is your responsibility to comply with all laws and regulations regarding transportation or shipping of your firearm. Absolutely no ammunition should be packaged with the firearm whether loaded in the firearm itself or included in the shipping container. The firearm should be transported only in a completely unloaded condition

Links

[FIREARM WARRANTY INFORMATION \(/SUPPORT/FIREARM-WARRANTY-INFORMATION\)](#)

[REPAIR SERVICE AND TRACKING \(/SUPPORT/REPAIR-SERVICES-AND-TRACKING\)](#)

[CONTACT \(/CONTACT-US\)](#)

[SAFETY CENTER \(/SUPPORT/SAFETY-CENTER\)](#)

[HELP CENTER \(/SUPPORT/HELP-CENTER\)](#)





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\$0.00

/ 0 items

## Remington Triggers

### Aftermarket / Replacement Remington Rifle Triggers (Model 700, Model 7, 721, XR-100, 40x)

Looking for a replacement or aftermarket trigger for your Remington 700, Model 7, 721, XR-100 or 40x rifle? Rifle Basix has what you're looking for. Aftermarket triggers that out-perform stock triggers! Our Remington rifle triggers are built with billet aluminum for high strength, yet light application. Our triggers are heat treated to reduce wear and the levers are nickel plated for smooth operation.

*All our K-Kits Come with Safety and Bolt Stop Release*

*To Replace the X-Mark Pro Trigger, you Need to Purchase One of our K-Kits*

Home &gt; Remington Triggers

SORT BY POPULARITY



#### REMINGTON TRIGGERS

Remington L-1K Kit 1.5lbs-4lbs pull  
- Hunting

**\$133.95**



#### REMINGTON TRIGGERS

Remington LV-1K Kit 8oz-1.5lbs pull - Varmint

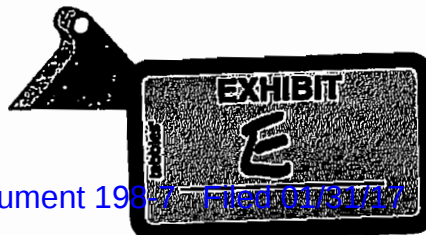
**\$144.95**



#### REMINGTON TRIGGERS

Remington ERV-3K Kit 4oz-20oz pull - Varm/Targ

**\$164.95**



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Y	Z				

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Please have the following information ready:

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2. Firearm Model and Serial Number
3. Gauge or Caliber of Firearm
4. Part Description
5. Any other pertinent information

Then please call our Sales Department toll free at:

**866-NUMRICH**

Home » Trigger Assembly

**PRODUCT DETAILS****TRIGGER ASSEMBLY**

REMINGTON | 721, 722

SKU: 719450



Trigger Assembly

**Our Price: \$107.45**Qty 1 **SOLD OUT** ADD TO WISH LIST